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Company Pride

Participation

Delivery

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May 11, 2001

Mr. Keith Jones  
Program Manager  
USDA-AAMS-TM-NOP  
Room 2945-South Building  
P.O. Box 96456  
Washington, D.C. 20090-6456

Dear Mr. Jones:

I am writing to support the petition of JR Woods requesting the allowance of Potassium Hydroxide as a processing aid to peel peaches during the production of Individually Quick Frozen (IQF) organic peaches. Stonyfield Farm is the largest manufacturer of organic yogurt in the nation. We have a reputation for quality and for upholding organic standards. We have been responsible for bringing to market many organic ingredients that were previously used non-organically under the allowance of "not commercially available".

Stonyfield Farm uses organic peaches in several of our yogurt products. The prohibition on the use of Potassium Hydroxide for peeling peaches would place a significant burden on Stonyfield Farm and the manufacture of our quality products.

Nationally, peach yogurt is the second most popular flavor of all small cup yogurts (after strawberry). One of the key characteristics of a high-quality fruit on the bottom (FOB) yogurt is good piece identity. That means we cannot use pureed peach in our peach FOB product. Because the peach skin has a different texture and consistency from the fruit, it creates a chewy mass that is not acceptable in an FOB product. Peeled peaches are absolutely essential in a quality peach FOB yogurt. We are also using the peach pieces in our blended yogurts- a flavored base with suspended fruit pieces.

Stonyfield Farm supports the allowance of Potassium Hydroxide for peeling organic peaches for the following reasons:

- There are no alternatives
  - The standards allow for the use of Potassium Hydroxide as a processing aid "except for the peeling of fruits and vegetables". For those fruits and vegetables where there is an alternative, such as the steaming of tomato skins, it is acceptable that Potassium Hydroxide not be allowed. I cannot however, see the logic as to why it is prohibited as a processing aid for fruits where there is not an alternative- as is the case with peaches. It

<sup>1</sup> Information Resources Inc. (IRI), 52 week ending March 25, 2001



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seems to be very inconsistent reasoning. Why is it acceptable as a processing aid for some products, but not others?

JR Wood has clearly demonstrated a good faith effort in testing alternative peel removal processes. At this time, there is no satisfactory alternative to the use of Potassium Hydroxide for removing the peels from peaches, while maintaining the structural integrity of the fruit.

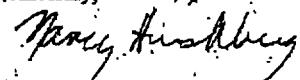
\* The Potassium Hydroxide is not present in the final product.

In the application of removing peach peels, the Potassium Hydroxide is clearly a processing aid and not present in the final product. It is cascaded over the fruit and enters the waste-water stream. The Potassium Hydroxide neutralizes the acidic wastewater. As JR Wood would be treating their wastewater with a neutralizing agent regardless, the Potassium Hydroxide used in the peel removal process is in essence a "credit" against chemicals that would otherwise be used. In other words, the process does not result in a net increase in chemical usage. Neutralizing wastewater is an environmentally sound form of treating wastewater.

JR Woods has demonstrated good faith in trying to develop other processes to remove peach peels. They will continue to work on alternative methods. Right now it is currently accepted organic practice to use Potassium Hydroxide to remove peach peels. To remove this allowance, would leave us without an alternative for one of the most popular flavors of yogurt.

For all the reasons previously stated, I urge you to allow the use of Potassium Hydroxide as a processing aid to peel peaches during the production of IQF organic peaches. Thank you for considering this request.

Sincerely,



Nancy B. Hirshberg  
Director of Natural Resources